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October 7, 2024

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

I am writing to further update the Court with regard to the subject of punitive damages financial disclosures. Today, Plaintiffs sent a proposed stipulation to the Defendants, and we expect to meet and confer with them over the next days or week. We request leave to submit a further update in 10 days, in the hope that we will be able to report that we will have reached agreement at that time.

Thank you for your courtesies and consideration.

Respectfully,



Adam M. Slater

Cc: Counsel of record (via ECF)